

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona  
Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

JEFFREY R. WERNER 11/1/98 TRUST; JEFFREY  
R. WERNER; and VIOLET M. WERNER, in her  
capacity as Trustee of the JEFFREY R. WERNER  
11/1/98 TRUST,

Adv. Pro. No. 10-04561 (SMB)

Defendants.
-------------

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 18, 2015.
2. Fact Discovery shall be completed by: May 12, 2017.
3. The Disclosure of Case-in-Chief Experts shall be due: August 1, 2017.
4. The Disclosure of Rebuttal Experts shall be due: August 31, 2017.
5. The Deadline for Completion of Expert Discovery shall be: October 2, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before October 10, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before October 23, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before February 19, 2018.

Dated: New York, New York  
October 8, 2015

**BAKER & HOSTETLER LLP**

Of Counsel:

By: /s/ Nicholas J. Cremona

David J. Sheehan

Nicholas J. Cremona

Dean D. Hunt

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

**BAKER & HOSTETLER LLP**

811 Main Street, Suite 1100

Houston, Texas 77002-5018

Telephone: (713) 751-1600

Facsimile: (713) 751-1717

Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and for the Estate of Bernard  
L. Madoff*